

**DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

NICOLE WOOTEN,

Plaintiff,
v.

Civil Action No.: 1:23-cv-00012

LIMETREE BAY TERMINALS d/b/a
OCEAN POINT TERMINALS, PORT
HAMILTON REFINING AND
TRANSPORTATION, and WEST INDIES
PETROLEUM LTD.,

Defendants.

**DEFENDANT OCEAN POINT TERMINALS F/K/A LIMETREE BAY TERMINALS
MOTION FOR ADMISSION *PRO HAC VICE* OF REGINALD E. JANVIER**

In accordance with Rule 83.1(b)(2) of the Local Rules of Civil Procedure, the undersigned respectfully moves for the admission *pro hac vice* of REGINALD E. JANVIER, ESQ., of the law firm AKERMAN LLP, located at 201 East Las Olas Blvd., Suite 1800, Fort Lauderdale, Florida 33301, Telephone number (954) 463-2700, for purposes of appearing as co-counsel on behalf of Defendant Ocean Point Terminals f/k/a Limetree Bay Terminals (“Ocean Point”), in the above-styled case.

In support thereof movant states as follows:

1. Mr. Janvier is a member in good standing of the Bar of the State of Florida (Bar No. 1011001). A Certificate of Good Standing from the Supreme Court of Florida, dated January 9, 2025, is attached hereto as **Exhibit A**.

2. Reginald E. Janvier is not admitted to practice in the District Court of the Virgin Islands. Mr. Janvier has not been disbarred, denied admission to practice, suspended from practice, or disciplined by any court or bar authority, and there are no disciplinary proceedings pending

against him, as affirmed by Mr. Janvier in his signed Pro Hac Vice Application, attached hereto as **Exhibit B.**

3. Movant, DONNIE M. KING, ESQ., of the law firm AKERMAN LLP, 201 East Las Olas Blvd., Suite 1800, Telephone number (954) 463-2700, has made an appearance in this action, is a member in good standing of Virgin Islands Bar and the District Court of the Virgin Islands, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom all notices, orders and pleadings may be served, and who shall approve and sign all documents filed and served on behalf of Ocean Point in this action.

4. In accordance with the local rules of this Court, the undersigned has made payment of this Court's \$250.00 admission fee.

WHEREFORE, Donnie M. King, moves this Court to enter an Order granting Reginald E. Janvier admission to appear before this Court on behalf of Defendant Ocean Point Terminals f/k/a Limetree Bay Terminals for all purposes relating to the proceedings in the above-styled matter.

DATED: January 29, 2025

Respectfully submitted,

AKERMAN LLP

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Suite 1800
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By: /s/ Donnie M. King

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*Counsel for Defendant Ocean Point Terminals f/k/a
Limetree Bay Terminals d/b/a*

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2025, a true and accurate copy of the foregoing was served via email on all attorneys of record.

/s/ Donnie M. King
Donnie M. King, Esq.